

From: [ANDERSON Jim M](#)
To: [Kristine Koch/R10/USEPA/US@EPA](#)
Cc: [MCCLINCY Matt](#); [JOHNSON Keith](#); [OMEALY Mikell](#); [Sylvia Kawabata/R10/USEPA/US@EPA](#); [TARNOW Karen E](#); [Chip Humphrey/R10/USEPA/US@EPA](#); [Eric Blischke/R10/USEPA/US@EPA](#)
Subject: PH RI/FS Negotiations Support
Date: 09/05/2006 03:10 PM

Kristine,

We quickly reviewed your 9/5 e-mail containing your draft agenda for the 9/6 meeting & your Statement of Work (SOW) for PH RI/FS Negotiations Support. Your SOW contains a number work elements that can help us reach our common source control goal. However, it also creates a number of concerns for us. Based on our initial review of your SOW, here are some of our more serious concerns.

1) We received your SOW today. Your meeting with your contractor is scheduled for tomorrow morning. I would have appreciated a longer review period & a greater amount of collaboration in developing the SOW.

2) Section I of the SOW states that the purpose of the SOW is to provide source control services for the oversight of site-wide upland work at PH. EPA is not overseeing upland source control. DEQ is overseeing upland source control, & EPA is supporting our effort.

3) DEQ has limited resources, & it appears that your SOW will require DEQ project managers & DEQ PH team members to help provide information to your contractors in building & maintaining the project control system. I'm reluctant to further dilute our staff time with additional tracking obligations.

4) The JSCS layouts the process & procedures for source control & reporting. It appears your proposal is designed to, at least partially, re-invent many all ready agreed-upon the JSCS processes & procedures.

5) I perceive a tone & certain assumptions in your SOW that I don't agree with..., but I may not be reading you correctly. It appears you believe DEQ is being regulated by EPA & that we need to be in compliance with EPA requirements. Once again, DEQ is the lead in upland source control & EPA is the supporting agency. Implying EPA may impose significant, site-specific requirements on upland source control work, beyond what was written & agreed upon in the JSCS, is counter to the agreement we made in the MOU.

You've previously mentioned your desire to establish a source control tracking system that will satisfy your needs for the project. We're supportive of you developing that system, especially if it can help us also.

As Matt mentioned to you in an earlier e-mail today..., we'll plan on joining your 9/6 meeting for the 1st hour, but will then have to drop-off. I see Matt just sent you an e-mail saying we only need 1 phone line. We'll call the Non- & ask for the Coho Room. You can advise the receptionist, Matt will be the one making the call.

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